

**DECLARATION OF STEVEN GOLDSTEIN**

I, Steven Goldstein, declare as follows:

1. I am 52 years of age and I reside in Kings County, New York.
2. I am a U.S. citizen and am of the Jewish faith.
3. I am the president of Congregation Bnei Matisyahu, which is a modern orthodox Jewish congregation, and I am authorized to speak on its behalf.
4. Bnei Matisyahu's synagogue, or *shul*, is located in the Midwood section of Kings County, New York and has existed for the last 11 years. It is conspicuously marked as a Jewish house of worship.
5. For several years, I have been licensed by the City of New York to possess a firearm on the premises of Bnei Matisyahu's synagogue. My license is current and still active.
6. Prior to September 1, 2022 – the date that the new concealed carry law went into effect in New York State – I would always carry a firearm when I was on the premises of Bnei Matisyahu's synagogue.
7. I carried a weapon on and around Bnei Matisyahu's synagogue because I am apprehensive that I, my family and my congregation will be targeted for acts of violence because of our Jewish faith.
8. Antisemitic attacks are a very real and potent fear among the Jewish community given the high incidence of anti-Jewish hate crime throughout the City of New York, New York State and the United States of America.
9. Members of Bnei Matisyahu are similarly fearful of being attacked, and over the last year, several members have told me so.
10. Members of Bnei Matisyahu do not want to be defenseless and several have told me that if I were not carrying a handgun at Bnei Matisyahu they would not attend services or participate in religious observances there.
11. Because Bnei Matisyahu is a small congregation, we do not have the financial ability to hire an outside security service.

12. Therefore I desired (and continue to desire) to carry a handgun while at my synagogue for the defense of myself, my family and my congregation.
13. Further, I desire (and continue to desire) to carry a handgun without having to worry that I will be subject to arrest and charged with a felony because I am participating in religious observances.
14. For as long as I have carried a concealed firearm at Bnei Matisyahu, the shul and its members have been aware that I was doing so and have approved of me doing so.
15. Under the new Concealed Carry Improvement Act (“CCIA”), I am prohibited from carrying a firearm in any “sensitive location.”
16. The CCIA defines sensitive locations to include “places of worship or religious observation.”
17. Since Bnei Matisyahu is a place of worship as well as a place of religious observation, I am forbidden from carrying my firearm on the premises of the shul, despite the fact that I have a preexisting license to do so.
18. Prior to the CCIA, I could carry a weapon without fear of being arrested for a felony while participating in various religious observances.
19. I fall into none of the categories of individuals who are exempt from this statutory prohibition.
20. Now that I am prohibited from carrying my handgun while on Bnei Matisyahu’s property, I am apprehensive and fearful of attack by anti-Jewish extremists. Other members of the shul have told me that they feel the same way.
21. As a direct consequence of the new statutory prohibition on possessing firearms in places of worship or during religious observation, I no longer attend Bnei Matisyahu with as much frequency as I did before the law went into effect. Other members have stopped attending for that reason, as well.
22. In fact, some individuals have ceased being members of Bnei Matisyahu because of their safety concerns there.
23. The loss of Bnei Matisyahu’s members has resulted in a loss of membership payments, which in turn has caused the shul financial harm.

24. If the New York State statutory prohibition against possessing firearms in places of worship or religious observation did not exist, Bnei Matisyahu would allow me to resume carrying my concealed handgun on its property.
25. A copy of my signature, sent by facsimile transmission or electronically, may be treated as the original for the purpose of serving and filing this declaration.

I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct.

Executed this 24<sup>th</sup> day of September, 2022 at New York City, New York

  
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Steven Goldstein

  
MICHAEL J. TAUBENBLAT  
NOTARY PUBLIC, State of New York  
No. 09TA6049834  
Qualified in Kings County  
Commission Expires Oct. 29 2022